

**REMARKS**

Claims 1-20 are pending. By this amendment, claims 1 and 11 are amended and claims 16-20 are added.

Examiner Chen is thanked for his courtesy extended to Applicant's representatives during the April 18, 2006 interview. During the interview, it was pointed out why claim 1 and its dependent claims are not anticipated by Carteau, as detailed below.

The Office Action rejects claims 1-15 under 35 USC 102(e) over Carteau (US Pat. 5,325,488). This rejection is respectfully traversed.

Claim 1 recites a plurality of paths coupling said channel unit to said plurality of cache units. The Office Action asserts that in Carteau, B1 and B2 are paths connecting channels units to caches CAs. However, in the claimed invention one channel unit is coupled to a plurality of cache units with a plurality of paths. In the example cited from Carteau, one path connects a channel unit to a plurality of caches. For example, path B2 connects channel unit HA2 to caches CA1 and CA2. If there is a problem with path B2, channel unit HA2 will not have a path to transfer or receive data from either cache CA1 or cache CA2.

For these reasons, claim 1 and all claims dependent therefrom are not anticipated by Carteau. Withdrawal of the rejection is requested.

New independent claim 16 recites a plurality of cache units, and a control unit that is coupled to said cache units. Carteau discloses control units which include processor PR, disk unit DE, host adaptor HA, mass memory adaptor DA, backup disk memory MSD and cache memory CA. Thus, the cache units are not coupled to the control units in Carteau, but instead are part of the control units.

Further, claim 16 recites a first path coupling said channel unit to one of said plurality of cache units, and a second path coupling said one of said plurality of cache units to said control

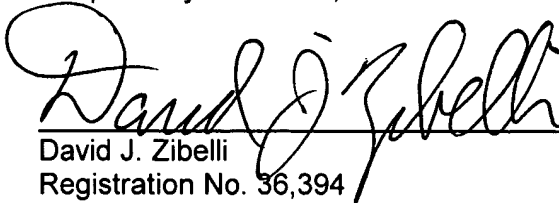
unit, wherein said first path is different from said second path. This claim requires that one of the cache units are coupled to the channel unit by a first path and that the same cache unit is coupled to the control unit by a second path, wherein the first path is different from the second path. It is submitted that this feature is not in Carteau because the cache units are part of the control units.

For the above reasons, it is submitted that the application is in condition for allowance. Prompt consideration and allowance are solicited.

The Office is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 11-0600.

Should the Examiner have any questions concerning this matter, he is invited to contact Applicant's undersigned attorney at 202/220-4334.

Respectfully submitted,

  
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Date: April 19, 2006

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**PATENT**  
**Serial No. 10/614,864**  
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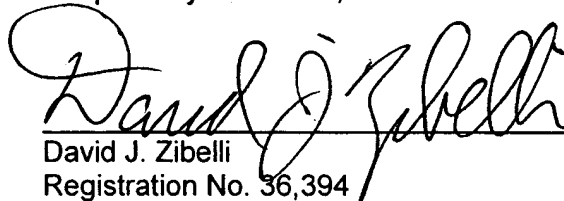
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